

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

CHAPTER 11

In re:

PURDUE PHARMA L.P., *et al.*,

CASE NO. 19-23649 (RDD)

Debtors.¹

(Jointly Administrated)

AFFIDAVIT AND DISCLOSURE STATEMENT OF PAUL B. SIMON
ON BEHALF OF GORDON, ARATA, MONTGOMERY, BARNETT, MCCOLLAM
DUPLANTIS & EAGAN, LLC

STATE OF LOUISIANA)
) s.s.:
COUNTY OF LAFAYETTE)

PAUL B. SIMON, being duly sworn, upon his oath, deposes and says as follows:

1. I am Member at Gordon, Arata, Montgomery, Barnett, McCollam, Duplantis & Eagan, LLC, located at 400 East Kaliste Saloom Road, Suite 4200, Lafayette, Louisiana, 70508 (the "Firm").

2. Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), have requested that the Firm provide services to the Debtors, and the Firm has consented to provide such services (the "Services").

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

3. The Services include, but are not limited to, the following: represent Debtors in certain matters filed against them in the state and federal courts of Louisiana, and provide legal counsel as to Louisiana law and legal practice related thereto.

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

7. As of the commencement of this chapter 11 case, the Debtors owed the Firm \$839.00 in respect of prepetition services rendered to the Debtors.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on December 6, 2019 at Lafayette, Louisiana



PAUL B. SIMON

SWORN TO AND SUBSCRIBED before
Me this 6TH day of DECEMBER, 2019



Notary Public

SAMANTHA M. HANNON
NOTARY PUBLIC
NOTARY ID #133224
STATE OF LOUISIANA
My commission is for life

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

CHAPTER 11

In re:

PURDUE PHARMA L.P., *et al.*,

CASE NO. 19-23649 (RDD)

Debtors.²

(Jointly Administrated)

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”).

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

Paul B. Simon

Gordon, Arata, Montgomery, Barnett, McCollam, Duplantis & Eagan, LLC

400 E. Kaliste Saloom Road, Suite 4200

Lafayette, Louisiana 70508

2. Date of retention: 11/13/17

3. Type of services to be provided:

Represent Debtors in certain matters filed against them in the state and federal courts of Louisiana, and provide legal counsel as to Louisiana law and legal practice related thereto.

² The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

4. Brief description of services to be provided:

Provide advice and counsel concerning Louisiana law and legal practice; with the cooperation of national counsel, prepare and file pleadings and other court documents in cases in Louisiana's state and federal courts on behalf of debtors, and participate in the other stages of proceedings in such cases on behalf of Debtors.

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly

- (a) Average hourly rate (if applicable):

\$300.00 for Paul B. Simon; \$375 for Samuel E. Masur; \$100 for paralegals

- (b) Estimated average monthly compensation based on prepetition retention (if company was employed prepetition):

Less than \$1,500 per month given current, stayed status of cases; when cases active, average fees were approximately \$11,000 per month

6. Prepetition claims against the Debtors held by the company:

Amount of claim: \$ 839.00

Date claim arose: 9/15/19

Nature of claim: Legal fees and expenses

7. Prepetition claims against Debtors held individually by any member, associate, or Employee of the company:

None

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

None


9. Disclose whether the professional currently represents any of the Debtors' existing shareholders, including trusts, beneficiaries, companies, affiliates, family members and any similar related parties (together, the "Shareholder Parties"), and/or any entity owned or controlled by any Shareholder Party (in each case other than any Debtor), and whether any Shareholder Party or any entity owned or controlled by any Shareholder Party (other than any Debtor) accounted for more than 1% of the professionals' annual revenue for any of the last five years. If so, describe what ethical walls or other protections are in place with regard to the concurrent representations

None

10. Name and title of individual completing this form:

Attorney Paul B. Simon

Dated: December 6, 2019



PAUL B. SIMON
GORDON, ARATA, MONTGOMERY
BARNETT, MCCOLLAM, DUPLANTIS
& EAGAN, LLC
400 East Kaliste Saloom Road, Suite 4200
Lafayette, Louisiana 70508